



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

VIA UPS

JUN 20 2016

Mr. Tom Estock  
Director of Environmental Management  
Quad Graphics LLC  
N61 W23044 Harry's Way  
Sussex, Wisconsin 53089-3995

Re: **Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding the Generation and Management of Hazardous Waste by Quad Graphics LLC, EPA ID No. PAD051397768.**

**Information Request – Reference No. C16-018**

Dear Mr. Estock,

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting additional information to supplement the information obtained by EPA during the August 4, 2015 Compliance Evaluation Inspection ("CEI") of Quad Graphics LLC ("QG" or "Facility") located at 4581 Lower Valley Road in Atglen, Pennsylvania and the Information Request Letter ("IRL") sent from EPA to the Facility on January 15, 2016. EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes . . ." EPA hereby requires that you furnish to EPA, **within fifteen (15) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.



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Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the person(s) who prepared the original and the date the document became effective at the Facility. *Copies of all documents must be legible.*

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence (including electronic (e.g., e-mails)), offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266, 268, and 273 shall have the meanings set forth therein.

### Requested Information

According to EPA's Inspection Report documenting the CEI performed at the Facility on August 4, 2015, QG operates a Waste Water Treatment Plant ("WWTP") that accepts electroplating wastewater from the lithographic plate preparation process. All incoming waste water is collected in a "large pit", before it is transferred to one of the Facility's bulk storage tanks.

In regards to the "large pit" that receives waste water before it is transferred into the bulk tanks and treated, please answer the following questions:

1. Please describe all of the waste streams that enter the pit in question.
  - a. Include from where in the Facility's operations the waste streams come.
  - b. Include any hazardous waste determinations made on the waste streams.
2. Please describe for what the Facility is treating this waste water (e.g. metals, pH, etc.).
3. Is there any sludge generated within the pit?
  - a. If yes, describe how the sludge is handled from generation to disposal.
  - b. If yes, provide any waste determination made on the sludge.
4. Please provide photos of the pit in question. Include at least one overview photo and at least one close-up photo.



5. Please describe the construction of the unit.
  - a. Include the construction materials and the year of construction.
  - b. Provide any written descriptions, "as built" engineering drawings, and any other data/documents that describe the construction of the pit.
6. Please state if the pit has freestanding walls that are structurally reinforced to maintain the structural integrity of the unit including any supporting documentation (e.g. engineering drawings, structural diagrams, etc.).
7. Please state if the pit has sloping walls. Provide any supporting documentation.
8. Please state if the pit has any method of leak detection or monitoring well system and provide any supporting documentation.
9. Please state if the pit has had any leaks and provide any supporting documentation.

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_

With regard to the Small Business Regulatory Enforcement and Fairness Act (SBREFA), please see the "Information for Small Businesses" memo, enclosed, which might be applicable to your company. This enclosure provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance.

As noted in the enclosure, any decision to participate in such program or to seek compliance assistance does not relieve you of your obligation to respond in a timely manner to an EPA request or other enforcement action, create any rights or defenses under law, and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action. EPA has not made a determination as to whether or not you [or your company] are covered by the SBREFA.

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Please send your response to:

Rebecca Serfass (3LC70)  
Land and Chemicals Division  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

If you have any questions concerning this matter, please contact Ms. Rebecca Serfass at (215) 814-2047 or at [Serfass.Rebecca@epa.gov](mailto:Serfass.Rebecca@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Amend".

Carol Amend, Associate Director  
Land and Chemicals Division  
Office of Land Enforcement

Enclosures

cc: R. Serfass (3LC70)  
P. Belgiovane (3LC70)

## **CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

\_\_\_\_\_  
NAME (print or type)

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE